

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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**PLAINTIFF'S REPLY IN SUPPORT OF ITS SECOND MOTION TO ADJOURN
SCHEDULING ORDER DATES**

Defendant opposes the instant motion to adjourn, yet refuses to participate in the discovery process, necessitating adjournments and discovery motions.

Defendant failed to appear for his deposition and a motion to compel is pending. (Docket No. 47). Similarly, Defendant is overdue in producing the following discovery responses:

- Responses to Interrogatories (Served 11/8/2010¹), due 12/8/2010;

¹ See proof of service at Docket No. 50.

- Responses to Requests for Production of Documents (Served 11/8/2010²), due 12/8/2010; and
- Responses to Requests for Admissions (Served 11/8/10³), due 12/8/10.

Plaintiff will be filing a motion to compel these documents⁴. If Defendant actually wishes to expedite this matter, he must allow discovery instead of burdening the court with discovery motions and frivolous motions for protective orders. (See Docket No. 56).

Given these additional discovery abuses which require Motion Practice, supplemental grounds exist which merit adjourning scheduling order dates. Accordingly Plaintiff respectfully requests that the Court enter an order adjourning the scheduling order dates 90 days such that discovery may be conducted.

Respectfully Submitted,

/s/ Eric A. Buikema (P58379)
Eric A. Buikema (P58379)
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Dated: December 13, 2010

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiff's Reply in Support of its Second Motion to Adjourn Scheduling Order Dates and this Certificate of Service were served upon Steven L. Woodward, Defendant, via his email address Steve_L_woodward@yahoo.com and

² See proof of service at Docket No. 50.

³ See proof of service at Docket No. 50.

⁴ As Defendant's failure to respond to Plaintiff's Request for Admissions deemed the same conclusively admitted pursuant to Fed. R. Civ. P. 36(b), Plaintiff will be supplementing its pending Renewed Motion for Preliminary Injunction (Docket No. 47) with Defendant's admitted liability.

First Class U.S. mail to Steven Woodward, c/o 7211 Brittwood Lane, Flint, MI 48507 on
December 13, 2010.

/s/ Eric A. Buikema
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